

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION
OPIATE LITIGATION**

**MDL No. 2804
Case No. 17-md-2804
Judge Dan Aaron Polster**

This document relates to:

*The County of Cuyahoga v. Purdue
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.
Purdue Pharma L.P. et al.*,
Case No. 18-OP-45090

**DECLARATION OF TIMOTHY W. KNAPP REGARDING
REPLY IN SUPPORT OF DEFENDANTS' MOTION TO EXCLUDE
MEREDITH ROSENTHAL'S OPINIONS AND PROPOSED TESTIMONY**

I, Timothy W. Knapp, declare as follows:

1. I am an attorney at Kirkland & Ellis LLP, counsel for Defendants Allergan Finance, LLC, Allergan plc, Allergan Sales, LLC, and Allergan USA, Inc. in the above captioned case.
2. I submit this declaration regarding the Reply in Support of Defendants' Motion to Exclude Meredith Rosenthal's Opinions and Proposed Testimony.
3. Attached as Exhibit 1 is a true and correct copy of the Qi, "The Impact of Advertising Regulation on Industry: The Cigarette Advertising Ban of 1971," RAND Journal of Economics 44, no. 2 (2013).
4. Attached as Exhibit 2 is a true and correct copy of the May 10, 2019 Expert Report of Robin Cantor, Ph.D.
5. Attached as Exhibit 3 is a true and correct copy of the May 10, 2019 Expert Report of Henry Grabowski, Ph.D.

6. Attached as Exhibit 4 is a true and correct copy of Conti *et al.*, “Generic prescription drug price increases: which products will be affected by proposed anti-gouging legislation?,” Journal of Pharmaceutical Policy and Practice 11 no. 1 (2018);

7. Attached as Exhibit 5 is a true and correct copy of the Meara. *et al.*, “State and Federal approaches to health reform: What works for the working poor?,” National Bureau of Economic Research (2008).

8. Attached as Exhibit 6 is a true and correct copy of the Pandya *et al.*, “Cost-effectiveness of Financial Incentives for Patients and Physicians to Manage Low-Density Lipoprotein Cholesterol Levels,” JAMA Network 1 no. 5 (2018).

9. Attached as Exhibit 7 is a true and correct copy of an excerpt of Murray, “Econometrics: A Modern Introduction,” (2006).

10. Attached as Exhibit 8 is a true and correct copy of Angrist & Krueger, “Instrumental Variables and the Search for Identification: From Supply and Demand to Natural Experiments,” (2001).

Dated: August 16, 2019

Respectfully submitted,

/s/ Timothy W. Knapp

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Actavis, Inc. f/k/a Watson Pharmaceuticals, Inc.;
Allergan Sales, LLC; Allergan USA, Inc.; and specially
appearing Defendant Allergan plc f/k/a Actavis plc*

CERTIFICATE OF SERVICE

I, Donna M. Welch, hereby certify that on August 29, 2019 the foregoing document was served via the Court's ECF system to all counsel of record.

/s/ Donna M. Welch

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